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May 21, 1999

FCC MAIL ROOM

LPFM

To: Whom it may concern
From: Thomas J. Roach
RE: LPFM (MM Docket 99-25)

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OPENING COMMENTS

I am writing you today regarding LPFM. A small group of people and myself are wanting to put an LPFM station on the air. I have previous broadcast radio experience (4 years prior to March 1, 1997) and feel as a group we could be an asset to the Blount or Loudon County areas of East Tennessee.

HOW LPFM CAN BEST SERVE THE PUBLIC

As an LPFM station we could be more involved in the community (such as fund raisers for non-profit organizations etc..) without having to run a heavy commercial load to cover the large station expenses that the full power stations have to cover. Due to the smaller size of operations, LPFM would have the capability of being more involved with the community.

COMMERCIAL

If permitted to do so underwriting or commercial rates could be low enough for small business to advertise on the radio. We feel that LPFM stations should be allowed to generate some form of revenue to cover cost of operations and license renewal fees (if any). Depending on the population in the LP100 and 1-10 watt micro-radio service areas would best determine if these stations could sustain an advertising base.

1-10 WATT MICRO-RADIO STATIONS

A 1-10 watt micro-radio class of license should be established to give more applicants an opportunity to get their own station, especially those living in markets where frequency availability is limited.

LPFM vs FULL POWER BROADCAST RULES

LP1000 watt stations should follow most or all of the rules due to the larger coverage area, but LP100 and the 1-10 watt micro-radio stations should not be required to follow some of the rules due to the smaller size and secondary status.

THE BEST POTENTIAL LPFM LICENSEE

Educational institutions should not be seen as the "Best" potential for an LPFM license because everybody should have an equal opportunity to get an LPFM license.

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BAND ON CHANNEL SYSTEMS

We feel that the only adverse effects that LPFM would have on Band on Channel systems would be frequency availability and if sufficient distance spacing on the same frequency between LPFM stations and Band on Channel systems would be possible in some markets.

FILING WINDOWS

We are not sure about the filing window length but we do feel that maybe a first come first serve basis would be acceptable.

MUTUAL EXCLUSIVITY

The best means to resolve some mutual exclusivity would be to offer another frequency at another class of license if frequency availability permits it. If that would not be acceptable to those applicants, then the only option would be an auction.

CLOSING COMMENTS

The time you have taken to read the above comments and any consideration regarding LPFM is greatly appreciated! We feel that the full power stations are losing touch more and more with the community (at least around here anyway). The creation of LPFM is necessary not only to give more people a chance to own a radio station but with the smaller size LPFM stations would be able to be more involved in the community.

Thank You,



Thomas J. Roach

Please send replies to:
Thomas J. Roach
P.O. Box 187
Greenback, Tn. 37742

Or contact me at:
Phone: (423) 981-7453 or
Email: kf4vdx@juno.com